

STEVEN C. MITCHELL, ESQ., SBN 124644
ROBERT W. HENKELS, ESQ., SBN 255410
GEARY, SHEA, O'DONNELL, GRATTAN & MITCHELL, P.C.
37 Old Courthouse Square, Fourth Floor
Santa Rosa, California 95404
Telephone: 707/545-1660
Facsimile: 707/545-1876
Email: smitchell@gsoglaw.com
rhenkels@gsoglaw.com

Attorneys for Defendants
CITY OF ROHNERT PARK, BRIAN MASTERSON, RYAN FOILES,
CHARLES LARSON, "FNU" AGER, and JEFF JUSTICE

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER KNAPP; SAMUEL KNAPP;
and KAREN KNAPP,

Plaintiffs,

v.

CITY OF ROHNERT PARK, a municipal
corporation; BRIAN MASTERSON,
individually and in his official capacity as Chief
of Police the CITY OF ROHNERT PARK;
RYAN FOILES#399, individually and in his
official capacity as a police officer for the CITY
OF ROHNERT PARK; CHARLES LARSON,
individually and in his official capacity as police
officer for the CITY OF ROHNERT PARK;
"FNU" AGER, individually and in his official
capacity as a police officer for the CITY OF
ROHNERT PARK; JEFF JUSTICE, individually
and in his official capacity as a police officer for
the CITY OF ROHNERT PARK; DOES 1-25,
inclusive,

Defendants.

CASE NO.: C12-01917-WHA

**STIPULATION OF PARTIES FOR
ADMINISTRATIVE ORDER EXTENDING
DATE OF CASE MANAGEMENT
CONFERENCE; [Proposed]
ADMINISTRATIVE ORDER EXTENDING
DATE FOR CASE MANAGEMENT
CONFERENCE**

Courtroom 8, 19th Floor
Honorable William Alsup

TO THIS HONORABLE COURT:

Pursuant to Northern District Local Rule 16-2(e), all plaintiffs and the City of Rohnert Park
hereby stipulate to, and request, an Administrative Order of this Court rescheduling the Case
Management Conference currently set for August 23, 2012 in Courtroom 8, 19th Floor of the U.S.

LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL
GRATTAN &
MITCHELL
P.C.

District Court for the Northern District of California. In support of this request, each of the affected parties by and through their respective attorneys of record hereby agree and stipulate as follows:

1. Plaintiffs filed the above-referenced action on April 17, 2012, the City of Rohnert Park was not served with the complaint until July 27, 2012. The City's last day to answer the complaint is August 17, 2012.

2. Plaintiffs have not yet served the individually named defendants. As reflected in the proofs of service, plaintiffs served the City of Rohnert Park's record supervisor, who is authorized to accept service on behalf of the City but is not authorized to accept service on behalf of the individual defendants. After negotiation, plaintiffs have forwarded to counsel for the City of Rohnert Park several Requests for Waiver of Service of Summons. Defense counsel is currently seeking authorization to waive service of summons on behalf of the individually named defendants.

3. In addition, neither trial attorney involved in this matter is available for the currently scheduled Case Management Conference. Defense trial counsel, Steven C. Mitchell, is currently out of the state on a previously-planned vacation and will not return until August 24, 2012. Similarly, plaintiffs' counsel is currently out of the state on vacation and will not return until the end of August.

4. Accordingly, due to the parties' necessity to resolve service-related issues, and due to the fact that neither trial attorney is available for the currently scheduled Case Management Conference, the parties respectfully request that this Court reschedule the Case Management Conference from August 23, 2012 to September 20, 2012, at 11:00 am or as soon thereafter as is convenient for the Court.

5. Aside from the dates triggered by the Initial Case Management Conference date and FRCP Rule 26, no other previously scheduled dates will be affected by this Order.

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LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL
GRATTAN &
MITCHELL
P.C.

1 IT IS SO STIPULATED.

2 DATED: August 14, 2012

GEARY, SHEA, O'DONNELL, GRATTAN &
MITCHELL, P.C.

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5 By /s/
ROBERT W. HENKELS
Attorneys for Defendant
6 CITY OF ROHNERT PARK, BRIAN
MASTERSO, RYAN FOILES, CHARLES
7 LARSON, "FNU" AGER, and JEFF JUSTICE

8 DATED: August 14, 2012

LAW OFFICES OF JOHN L. BURRIS

9
10 By /s/
BENJAMIN NIESENBAUM
Attorneys for Plaintiffs
11 CHRISTOPHER KNAPP, SAMUEL KNAPP
12 and KAREN KNAPP

13 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND LOCAL RULE**
14 **VIII.B.**

15 I, Robert W. Henkels, declare under penalty of perjury under the laws of California and the
16 United States that I have in my possession e-mail correspondence from plaintiffs' counsel that the
17 content of this document is acceptable to all persons required to sign the document. I declare that
18 this document was signed in Santa Rosa, California, on August 9, 2012.

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20 DATED: August 14, 2012

GEARY, SHEA, O'DONNELL, GRATTAN &
MITCHELL, P.C.

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22
23 By /s/
ROBERT W. HENKELS
Attorneys for Defendant
24 CITY OF ROHNERT PARK, BRIAN
MASTERSO, RYAN FOILES, CHARLES
25 LARSON, "FNU" AGER, and JEFF JUSTICE

26 LAW OFFICES OF
GEARY,
SHEA,
O'DONNELL
27 GRATTAN &
MITCHELL
28 P.C.

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PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING:

The Case Management Conference in the above-referenced action currently set for August 23, 2012 is reset to: (Date) September 20, 2012, at (Time): 11:00 a.m., in Courtroom 8, 19th Floor of the U.S. District Court for the Northern District of California, San Francisco, California. A Joint Case Management Conference Statement shall be filed seven (7) calendar days before the new date.

IT IS SO ORDERED.

THERE WILL BE NO FURTHER CONTINUANCES.

Date: August 16, 2012.

